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**From:** Wayne Miller [Miller.Wayne@azdeq.gov]  
**Sent:** 8/28/2018 5:11:44 PM  
**To:** d'Almeida, Carolyn K. [dAlmeida.Carolyn@epa.gov]  
**CC:** steve [steve@uxopro.com]  
**Subject:** 2018-8-28 - WAFB -ADEQ input -EPA Proposed benzene characterization Well Locations -7-3-2018 & 8-21-2018-ST012 pre-EBR-

Carolyn – Please find below ADEQ’s input on EPA’s requested benzene characterization well locations.

ADEQ and UXO Pro, Inc. reviewed the ST012 Containment Plan figures that were forwarded 8-21-2018 via email. The figures illustrate proposed wells that were referenced in a July 3, 2018 EPA-authored letter to Catherine Jerrard, AFCEC/CIBW, requesting U.S. Air Force *Demonstration of Hydraulic Containment at ST12 Fuels Spill Site, Former Williams Air Force Base, Mesa Arizona*. ADEQ received the letter copy 7-3-2018 via email.

ADEQ and UXO Pro, Inc. offer the following:

1. **Cobble Zone:** Location and prioritization are okay, with consideration to move EPA’s priority #4 well southeast to the ST012 site’s physical boundary to close a gap between offsite wells C02 and CZ24.
2. **UWBZ:** Wells 1, 2, and 4 prioritization is okay. Consider moving well #1 farther north. Alternatively, an UWBZ perimeter characterization well location could include a well or wells at the same locations as the downgradient CZ wells beyond CZ23. Given the increased concentrations in CZ23, one might expect a similar increase in the UWBZ here. Added wells may not be required east of Sossaman Road, if we consider wells RB-3A and U38 have been <1 ppb benzene since 2011 and UWBZ38 has been <1 ppb benzene since it was installed.
3. **LSZ:** Well locations 1, 2, and 5 are okay. Given the SB18 soil boring east of Sossaman Rd., an LSZ well at the soil boring SB18 location or farther downgradient (east) could be critical to close a data gap between LSZ45 and LSZ55. The Field Variance Memo 4, Attachment 4 could be used to support well installation justification.

Thanks.

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